## IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	)	CASE NO.: 23-13774-AMC
Stephanie Joanne Jahr,	)	
Debtor	)	CHAPTER 13

## OBJECTION OF BRIDGECREST CREDIT COMPANY, LLC AS SERVICER FOR CARVANA, LLC TO CONFIRMATION OF DEBTOR'S PROPOSED PLAN

Bridgecrest Credit Company, LLC as Servicer for Carvana, LLC ("BRDG"), by and through its attorneys, Lavin, Cedrone, Graver, Boyd & DiSipio, files **Objection to Confirmation of Debtor's Proposed Plan** and states:

- On July 06, 2021, Debtor Stephanie Joanne Jahr, entered into a Retail Installment Sales
  Contract in the principal amount of \$22,683.40 (the "Contract") that referred and related to the
  purchase of a 2018 AUDI Q5 Utility 4D Premium Plus AWD 2.0L I4 Turbo, V.I.N.
  WA1BNAFY7J2076361 (the "Motor Vehicle").
- 2. BRDG is the assignee of the Contract.
- 3. To secure the Contract, Debtor Stephanie Joanne Jahr granted a first lien on the Motor Vehicle in favor of BRDG.
- 4. On December 13, 2023, Debtor filed a Voluntary Petition under Chapter 13 of the United States Bankruptcy Code.
- 5. On January 15, 2024, Debtor filed a Proposed Plan (the "Plan").
- 6. The Chapter 13 Trustee has scheduled a Meeting of Creditors for March 15, 2024.
- 7. The plan lists the amount of the claim at \$20,160.87 at 10.00% interest.
- 8. Pursuant to 11 U.S.C. §1325, a vehicle purchased within 910 days preceding the date of the filing of the petition, and collateral for that debt consists of a motor vehicle acquired for personal use of the Debtor, said claim shall not be valued under 11 U.S.C. §506. In the case at hand, the Vehicle was purchased on July 06, 2021 is a purchase money security interest, and is used for

- Debtor's personal use. Therefore BRDG asserts its claim should be allowed as fully secured.
- 9. As of the December 13, 2023, the balance on Bridgecrest Credit Company, LLC as Servicer for Carvana, LLC Total claim was \$21,675.23.
- 10. Bridgecrest Credit Company, LLC as Servicer for Carvana, LLC is entitled to a secured claim of \$21,675.23 at 9.50%.
- 11. For the foregoing reasons, BRDG objects to confirmation of the Plan.

WHEREFORE Bridgecrest Credit Company, LLC as Servicer for Carvana, LLC, respectfully requests this Honorable Court to deny confirmation of the Plan.

Respectfully submitted,

Lavin, Cedrone, Graver, Boyd & DiSipio

BY: /s/ Regina Cohen

Regina Cohen
State Bar #57272
Suite 500 190 North Independence Mall West
6th & Race Streets
Philadelphia, PA 19106
(215) 351-7551
Attorney for
Bridgecrest Credit Company, LLC as Servicer
for Carvana, LLC

Dated: February 20, 2024